

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

BENJAMIN P. TOLKOFF (NYB 4294443)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7296
Facsimile: (415) 436-7234
Benjamin.Tolkoff@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR 09-0496 (WHA)
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME UNDER FED. R. CRIM.
v.)	18 U.S.C. § 3161
)	
SANTOS LISCONA-TURCIO,)	
)	
Defendant.)	
_____)	

On May 19, 2009, the parties in this case appeared before the Court for an initial appearance. At that time, the parties requested, and the Court agreed, to continue this matter for a status conference, and possible change of plea and sentencing, on June 2, 2009. The parties agree that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for this extension.

The defendant also agrees to exclude for this period of time any time limits applicable under 18 U.S.C. § 3161. The parties represented that granting the continuance was the

reasonable time necessary for continuity of counsel and effective preparation. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agreed that the ends of justice served by granting such a continuance outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

DATED: May 11, 2009

/s/
BENJAMIN P. TOLKOFF
Assistant United States Attorney

DATED: May 11, 2009

/s/
DANIEL BLANK
Attorney for SANTOS LISCONA-TURCIO

For the reasons stated above, the Court finds that the continuation of this matter from May 19, 2009, to June 2, 2009, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. §3161(h)(7)(B)(iv).

SO ORDERED.

DATED: May 20, 2009

THE
United States

